



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C., 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

VIA ELECTRONIC MAIL

May 5, 2020

Andrew DeVore
Vice President and Associate General Counsel, Litigation and Regulatory
Amazon Services, LLC
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Seattle, Washington 98109
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Re: Notice of Violation of the Clean Air Act

Dear Mr. DeVore:

The United States Environmental Protection Agency ("EPA") has investigated and continues to investigate Amazon.com, Inc. and Amazon Services, LLC (collectively "Amazon") for compliance with the Clean Air Act ("CAA" or "the Act"), 42 U.S.C. §§ 7401–7671q, and its implementing regulations. As summarized in this Notice of Violation, the EPA has determined that Amazon sold or offered for sale, or caused the sale or offer for sale of, parts or components for motor vehicle engines that bypass, defeat, or render inoperative devices or elements of design installed on motor vehicles and motor vehicle engines to meet emission standards promulgated under the CAA, and knew or should have known that these parts or components were offered for sale or installed for such use or put to such use. Therefore, Amazon has violated Section 203(a)(3)(B) of the Act, 42 U.S.C. § 7522(a)(3)(B).

Law Governing Alleged Violations

This Notice of Violation arises under Part A of Title II of the Act, 42 U.S.C. §§ 7521–7554, and the regulations promulgated thereunder. These laws were enacted to reduce air pollution from mobile sources of air pollution. In creating the Act, Congress found, in part, that "the increasing use of motor vehicles . . . has resulted in mounting dangers to the public health and welfare."¹ Congress' purpose in creating the Act, in part, was "to protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare and the productive capacity of its population," and "to initiate and

¹ CAA § 101(a)(2), 42 U.S.C. § 7401(a)(2).

accelerate a national research and development program to achieve the prevention and control of air pollution.”²

The EPA’s allegations here concern parts or components for motor vehicles and engines subject to emission standards.³ The Act requires the EPA to prescribe and revise, by regulation, standards applicable to the emission of any air pollutant from new motor vehicles or engines that cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare.⁴ As required by the Act, the emission standards “reflect the greatest degree of emission reduction achievable through the application of [available] technology.”⁵ Motor vehicles and engines are subject to specific emission standards for each pollutant, based on a vehicle’s or engine’s class and model year.⁶

Vehicle and engine manufacturers employ many devices and elements of design to meet emission standards. *Element of design* means “any control system (i.e., computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine.”⁷ For example, manufacturers often employ retarded fuel injection timing systems as a primary emission-related element of design to achieve reduction of emissions of oxides of nitrogen (“NOx”) and particulate matter (“PM”). Manufacturers also employ certain hardware devices as emission control systems and elements of design to reduce emissions of regulated pollutants into the ambient air. Examples of such devices include sensors, filtration systems such as diesel particulate filters (“DPFs”) also referred to as periodic trap oxidizer (“PTOX”), exhaust gas recirculation (“EGR”) systems, and catalyst devices such as diesel oxidation catalysts (“DOC,” also referred to as “CAT”), NOx adsorption catalysts (“NAC”), and selective catalytic reduction⁸ (“SCR”) systems. Modern vehicles and engines are equipped with devices known as electronic control modules (“ECMs”). ECMs continuously monitor engine and other operating parameters and control the emission control devices, such as the fueling strategy.

Manufacturers further employ onboard diagnostics, or “OBD,” which comprise of systems that monitor components that can affect the emission performance of a motor vehicle, detect problems with the vehicle’s emission-related systems that could cause the vehicle to fail to comply with the CAA’s emission standards, alert drivers to these problems, and store electronically-generated malfunction information.⁹ If a problem is detected, the OBD system illuminates a warning indicator on the vehicle instrument panel to alert the driver, called a malfunction indicator light (“MIL”) or check engine light (“CEL”). The OBD system also records diagnostic trouble codes (“DTCs”) to provide ease of identification of the emission control problem for mechanics to repair. OBDs may cause an engine power reduction (known as “limp mode”) to prompt repair of a missing or malfunctioning emission-

² CAA § 101(b)(1)–(2), 42 U.S.C. § 7401(b)(1)–(2).

³ See generally 40 C.F.R. Part 86, Subpart A (setting emission standards for these categories).

⁴ CAA § 202(a)(1) and (3)(B), 42 U.S.C. § 7521(a)(1) and (3)(B).

⁵ CAA § 202(a)(3)(A)(i), 42 U.S.C. § 7521(a)(3)(A)(i).

⁶ See, e.g., heavy-duty diesel engine emission standards at 40 C.F.R. §§ 86.004-11, 86.007-11, 86.099-11 and light-duty vehicle emission standards at 40 C.F.R. § 86.1811-04. See also 40 C.F.R. §§ 86.090-8 (1990 and later model year light-duty vehicles); 86.094-9 (1994 and later model year light-duty trucks); 86.001-9 (2001 and later model year light-duty trucks); 86.004-9 (2004 and later model year light-duty trucks); 86.091-10 (1991 and later model year Otto-cycle heavy-duty engines and vehicles); 86.008-10 (2008 and later model year Otto-cycle heavy-duty engines and vehicles).

⁷ 40 C.F.R. § 86.094-2.

⁸ SCR systems include diesel emission fluid (“DEF”) injections and tank storage components.

⁹ See CAA § 202(m), 42 U.S.C. § 7521(m), requiring EPA to promulgate regulations requiring OBD systems for motor vehicles after 2007. See also 40 C.F.R. §§ 86.005-17, 86.007-17, 86.1806-05, and 86.1806-17.

related device or element of design. Given these functions, the OBD is a key part of a motor vehicle's emission control system.

To ensure that every new motor vehicle or motor vehicle engine sold, offered for sale, imported, delivered for introduction into commerce, or introduced into commerce in the United States (collectively, "introduced into commerce") satisfies applicable emission standards, the EPA runs a certification program for manufacturers. Under this program, the EPA issues certificates of conformity ("COCs"), thereby qualifying motor vehicles and engines for introduction into commerce.¹⁰ To obtain a COC, an original equipment manufacturer ("OEM") must submit a COC application to the EPA for each engine family (also referred to as test group) and each model year in which it intends to manufacture or import motor vehicles or engines for introduction into commerce. The COC application must include, among other things, identification of the covered engine family, a description of the motor vehicle or engine and its emission control systems, all auxiliary emission control devices ("AECDs")¹¹ and the engine parameters they sense, as well as test results from a test vehicle or engine showing that it satisfies the applicable emission standards.¹² The motor vehicles or motor vehicle engines must then be manufactured exactly as described in the approved COC application, in part to ensure that the emission control systems function as described.

In addition, the Act makes it a violation "for any person to manufacture or sell, or offer to sell, or install, any part or component intended for use with, or as part of, any motor vehicle or motor vehicle engine, where a principal effect of the part or component is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter, and where the person knows or should know that such part or component is being offered for sale or installed for such use or put to such use."¹³ It is also a violation to cause any of the foregoing acts.¹⁴

Alleged Violations

The EPA has determined that Amazon has sold or offered for sale, or caused to be sold or offered for sale, numerous products (commonly referred to as "Defeat Devices") that have a principal effect of bypassing, defeating, or rendering inoperative emission control devices or elements of design certified to control emissions on motor vehicles or motor vehicle engines. Amazon's website lists Defeat Devices which are intended for use with a variety of motor vehicles and motor vehicle engines including, but not limited to, light-duty diesel trucks and engines manufactured by entities such as FCA US LLC and its predecessors ("FCA"); General Motors Co. ("GM"); and Ford Motor Co. ("Ford"), as well as heavy-duty diesel engines manufactured by entities such as Cummins Corporation ("Cummins").

Amazon has sold three main categories of these "Defeat Device" products: (1) hardware parts or components that physically remove, disable, or bypass one or more components of the EGR system installed on or in a motor vehicle or motor vehicle engine ("EGR Delete Parts"); (2) parts or components that physically replace certified exhaust aftertreatment emission control devices or elements of design, such as the DPF, DOC, and/or SCR, from the exhaust system installed on or in a motor vehicle or motor

¹⁰ 40 C.F.R. § 86.007-30.

¹¹ An AECD is "any element of design which senses temperature, vehicle speed, engine RPM, transmission gear, manifold vacuum, or any other parameter for the purpose of activating, modulating, delaying, or deactivating the operation of any part of the emission control system." 40 C.F.R. § 86.082-2.

¹² 40 C.F.R. §§ 86.004-21, 86.007-21, 86.094-21, 86.096-21; *see also* EPA, *Advisory Circular Number 24-3: Implementation of Requirements Prohibiting Defeat Devices for On-Highway Heavy-Duty Engines* (Jan. 19, 2001).

¹³ CAA § 203(a)(3)(B), 42 U.S.C. § 7522(a)(3)(B).

¹⁴ CAA § 203(a), 42 U.S.C. § 7522(a).

vehicle engine (“Exhaust Aftertreatment Delete Pipes”); and (3) aftermarket software ECM program (commonly referred to as a “tune” or “calibration”) either distributed in a console (commonly referred to as a “tuner” or “programmer”) or transmitted electronically via weblink or email that are designed to modify the vehicle’s original ECM programming or calibrations and/or OBD operation, where a principal effect of the program is to bypass, defeat, or render inoperative devices or elements of design, including EGR, DOC, DPF, SCR, or OBD systems, or fuel injection timing calibrations, installed on or in motor vehicles or motor vehicles engines (“Defeat Tuning Products”).

Between July and November 2019, the EPA conducted a review of Amazon’s website for advertisements of Defeat Devices using keyword search terms in Amazon’s search engine. Such keyword searches included terms such as “DPF delete,” “EGR delete,” and other commonly used names and references for Defeat Devices or Defeat Device functions. Additionally, Amazon posts advertisements which list reviews of a “Verified Purchase” of the product on Amazon’s website. The EPA considers each sale of a Defeat Device through Amazon’s website, including those listed as a “Verified Purchase,” to be a violation of the CAA.

As listed in Table 1 below, the EPA’s review found that Amazon sold or caused the sale of at least 709 separate Defeat Device products, including: 251 EGR Delete Parts; 416 Exhaust Aftertreatment Delete Pipes; and 32 Defeat Tuning Products. Table 1 includes the corresponding quantity of “Verified Purchase” sales of such products listed in the related advertisements.

Table 1: Verified Purchases of Defeat Devices Sold on Amazon’s Website

ASIN	Product Name	Defeat Device Category	Verified Purchases ¹⁵
B003U6LMH6	MBRP S6212PLM Turbo Back Single Side Off-Road Exhaust System	Exhaust Aftertreatment Delete Pipe	132
B00QWZMK0K	AURELIO TECH EGR-0001-00 Diesel EGR Valve Power Stroke Kit for 2003-2010 Ford 6.0 E-350 E-450 F-250 Super Duty 904-218	EGR Delete Part	70
B07G3KGFNY	EGR Valve and Throttle Valve Kit - Dodge Cummins 6.7 6.7L 2010-2017 - DK Engine Parts (2010-2017 W/TVD)	EGR Delete Part	29
B07DWZCB89	Ford 6.4L 6.4 2008-2010 Powerstroke Engine Pipe - DK Engine Parts (EGR Valve Kit)	EGR Delete Part	25
B07P6QZ626	6.0 EGR Valve Pipe Kit fits Ford 6.0L Diesel Powerstroke 03-07 Ford Super Duty F250 F350 F450 F550, 03-05 Ford Excursion, 04-10 Ford E350 E450 Replace 904-228, 3C3Z6A642CA	EGR Delete Part	25
B076MD6298	Sinister Diesel EGR Cooler Kit for Dodge Cummins 2010-2016 6.7L	EGR Delete Part	20
B01M7MOKCR	Performance 5" Downpipe Down Pipe Back Exhaust Kit System 11-19 Ford F250/F350 6.7L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	18
B07D9TPWNZ	GM Chevrolet Duramax 6.6 6.6L EGR Valve Kit (LLY)	EGR Delete Part	16
B01M344H6R	Performance Race 4" Turbo Back With Downpipe Down Pipe Exhaust System Kit For 2007.5-2012 Dodge Ram 2500/3500 Cummins 6.7L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	16
B01ACD2RTG	5" Turbo Back Downpipe Exhaust System for 03-07 Ford F250/F350 Power Stroke 6.0L Turbo Diesel	Exhaust Aftertreatment Delete Pipe	15

¹⁵ As of January 21, 2020, unless otherwise noted.

B01M4LN5FW	Performance 5" Turbo Back Race Exhaust No Muffler Straight Pipe System With Downpipe Down Pipe Included For 2007.5-2012 Dodge Ram 2500 3500 Cummins 6.7L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	15
B001TJWFB8	Diamond Eye K4114A Turbo-Back Exhaust Kit	Exhaust Aftertreatment Delete Pipe	13
B007FHCIT2	04.5-'07 Dodge Ram Cummins 5.9L Diesel 2500/3500, 4" Aluminized Turbo Back Single (QUIET TONE)	Exhaust Aftertreatment Delete Pipe	11
B013JRES26	YANGCAN EGR Block Off Plate 2006-2007.5 LLY/LBZ Blocker Stainless Steel	EGR Delete Part	10
B009V14I7U	Diamond Eye K5238A-RP Turbo-Back Exhaust Kit	Exhaust Aftertreatment Delete Pipe	10
B01E6TEJ8E	MBRP S62240PLM 5" Aluminum Turbo Back, Single Side Exit (No Muffler) for Ford Diesel	Exhaust Aftertreatment Delete Pipe	10
B075QXW2JQ	Performance Racing Off Road Aluminized Steel 4" Downpipe Down Pipe Back DPF exhaust System Kit 2011-2017 Ford Superduty Powerstroke F250 F350 6.7L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	10
B013JSL1HU	YANGCAN EGR BLOCK OFF PLATE DURAMAX 04.5-05 LLY Blocker 2004.5-2005	EGR Delete Part	9
B003U6JHGE	MBRP S6126P Turbo Back Single Side Exhaust System	Exhaust Aftertreatment Delete Pipe	9
B01FLFLUFM	Diamond Eye Performance 2003-2007 FORD 6.0L POWERSTROKE F250/F350 (ALL CAB AND B	Exhaust Aftertreatment Delete Pipe	9
B01MFEMG1E	Performance Race 4" DownPipe Down Pipe Back Exhaust System Kit For 07.5-10 Chevy/GM 2500/3500 Duramax Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	9
B01M344KXT	Performance Race 4" DownPipe Down Pipe Back Exhaust System Kit For 2008-2010 Ford F250 F350 Power Stroke 6.4L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	9 – as of Feb. 11, 2020
B01KW68R2Y	Heavy Duty Polished Up Pipes No EGR For 2008-2010 Ford 6.4L Powerstroke Diesel	EGR Delete Part	8
B009AP386O	aFe 49-42030-P MACH Force XP 5" Stainless Steel Turbo-Back Exhaust System with Polished Tip for Dodge Diesel Trucks 07.5-12 L6-6.7L	Exhaust Aftertreatment Delete Pipe	8
B01N06C694	GearboxZ GBZ-FD40 2008-2010 6.4L for Ford 4.0 Programmer	Defeat Tuning Product	7
B01M7S62G9	Performance Race 4" Turbo Back Race Exhaust No Muffler Straight Pipe System With Downpipe Down Pipe Included For 08-10 Ford F250 F350 6.4L Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	7
B07BZYMBW7	Dodge Ram 6.7L Cummins 2007-2012 Diesel Truck DPF High Flow Pipe	Exhaust Aftertreatment Delete Pipe	7
B01MRKYYXV	Gorilla R110DGP EFI Live Autocal Tuner (INCLUDES 1 CUSTOM TUNE)	Defeat Tuning Product	6
B06WGNR9GN	Raceme Ultra Programmer with EGT Probe Pyro Kit - 2007.5-2017 Dodge Ram 6.7 Cummins Diesel 6.7L	Defeat Tuning Product	6
B07KZQ5TSF	EGR Valve Kit with Intake Elbow for 2008 2009 2010 Ford F250 F350 F450 V8 6.4L Powerstroke Diesel	EGR Delete Part	6 – as of July 22, 2019
B004WO69FU	MBRP S6224SLM 5" Single T409 Stainless Steel EC/CC Turbo Back Exhaust System	Exhaust Aftertreatment Delete Pipe	6
B01DYBUOG6	Diamond Eye 125109 Exhaust Kit	Exhaust Aftertreatment Delete Pipe	6
B01NAJ9PHV	Diamond Group 125034 Exhaust (03-07 Ford F250/F350 3.5In Alum-OEM Off Road Pipe)	Exhaust Aftertreatment Delete Pipe	6
B018WDRU9U	RaceME ULTRA DPF Delete Programmer 07.5-16 Dodge Cummins 6.7L	Defeat Tuning Product	5

B001J5UU9Q	Diamond Eye K5350A Turbo-Back Exhaust Kit	Exhaust Aftertreatment Delete Pipe	5
B007W45M60	aFe 49-03004NM ATLAS Aluminized Steel DP-Back Exhaust System for Ford Diesel Trucks V8-6.4L	Exhaust Aftertreatment Delete Pipe	5
B007W467WW	aFe 49-02003NM ATLAS Aluminized Steel Turbo-Back Exhaust System for Dodge Diesel Trucks L6-5.9L/6.7L	Exhaust Aftertreatment Delete Pipe	5
B009UQEDNU	aFe 49-03039NM ATLAS 5" Aluminized Steel Down-Pipe Back Exhaust System for Ford Diesel Trucks V8-6.7L	Exhaust Aftertreatment Delete Pipe	5
B01BD44O62	aFe Power 49-02054NM ATLAS 4" Aluminized Steel Turbo-Back Exhaust System	Exhaust Aftertreatment Delete Pipe	5
B01I599DN2	Diamond Eye Performance 2011-2012 FORD 6.7L POWERSTROKE F250/F350 (ALL CAB AND B	Exhaust Aftertreatment Delete Pipe	5
B009R614R4	aFe Power 49-02010 ATLAS Exhaust 4" Race Pipe; CAT+DPF-D	Exhaust Aftertreatment Delete Pipe	5 – as of July 22, 2019
B01LGFH3BQ	Deviant Race Parts 71100 EGR Delete Kits(01-05 Gm 6.6L Duramax Lb7/Lly Blocker Plate)	EGR Delete Part	4
B07L35NFYH	EGR Valve Kit for 2010 2011 2012 2013 2014 2015 2016 Dodge Ram 2500 3500 L6 6.7L Cummins Diesel	EGR Delete Part	4 – as of July 22, 2019
B001TJSNZK	Diamond Eye K4334A Turbo-Back Exhaust Kit	Exhaust Aftertreatment Delete Pipe	4
B01M8P8T1U	Stainless Steel 4" DownPipe Down Pipe Back Performance Race Exhaust System Kit For 2008-2010 Ford F250 F350 Power Stroke 6.4L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	4
B073X8GCB9	Stainless Steel Performance Racing 5" Downpipe Down Pipe Back Exhaust Kit For 07-10 Chevy/GMC GM Silverado Sierra 2500HD 3500 6.6L Duramax Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	4
B075NR6Q2L	Performance Racing Off Road 5" Aluminized Steel Downpipe Down Pipe Back DPF Exhaust System Kit 2011-2015 Chevy GMC Silverado Sierra 2500HD 3500 Duramax 6.6L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	4
B0107SYVI6	Machter EGR Block Off Plate for Duramax Diesel 2004.5-2005 LLY Blocker Stainless Steel	EGR Delete Part	3
B017NGC9SE	YANGCAN DURAMAX Diesel EGR Block Off Plate 2004.5-2005 LLY Blocker Stainless Steel	EGR Delete Part	3
B01M0URFNH	EGR Block Off Plate for Ford Powerstroke 6.0L Diesel 2003-2007 F250 F350 F450 F550	EGR Delete Part	3
B00LZU9Z12	aFe Atlas 4" Turbo-Back Aluminized Steel Exhaust System Dodge Ram 2500/3500 Cummins L6 6.7L 07.5-12	Exhaust Aftertreatment Delete Pipe	3
B01DYBUTWK	Diamond Eye 125113 Exhaust Kit	Exhaust Aftertreatment Delete Pipe	3
B01E6TEAV0	MBRP S61160PLM 5" Aluminum Turbo Back, Single Side Exit (No Muffler) for Dodge Diesel	Exhaust Aftertreatment Delete Pipe	3
B01M5DV2HF	SS409 Stainless Steel 4" Turbo Back Race Exhaust No Muffler Straight Pipe System With Downpipe Down Pipe Included For 08-10 Ford F250 F350 6.4L Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	3
B072BMSJX8	Performance Racing 5" Dual Turbo Back + Downpipe Down Pipe Included Exhaust System 13-17 Dodge Ram 2500 3500 Cummins 6.7L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	3
B07BMJQPX4	Performance Racing Off Road 4" Aluminized Steel Downpipe Replacement Exhaust Pipe Kit System For 2007-2012 Dodge Ram 2500 3500 Cummins 6.7L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	3
B01M9HTWNO	Stainless Steel 4" DownPipe Down Pipe Back Performance Race Exhaust System Kit For 07.5-10 Chevy/GM 2500/3500 Duramax Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	3 – as of July 22, 2019

B07CVMSJQ4	GearboxZ for 2011-2016 6.7L Ford Powerstroke Competition Programmer GBZ-41	Defeat Tuning Product	2 – as of July 22, 2019
B07L6RQTS8	MM3 Tuner kit for 2013-2018 Dodge Cummins	Delete Package (Defeat Tuning Product, EGR Delete Part, Exhaust Aftertreatment Delete Pipe)	2
B0107S49UQ	Machter EGR Block Off Plate fits Duramax 04.5-05 LLY Blocker for Chevy & GM 2004.5-2005	EGR Delete Part	2
B01LGUSFXQ	Deviant Race Parts 75111 EGR Delete Kits(11-14 Gm 6.6L Duramax Lmlblocker Plate)	EGR Delete Part	2
B078N83F76	YANGCAN EGR Block Off Plate fits Duramax Diesel 2007.5-2011 LMM Blocker Stainless Steel 07-11	EGR Delete Part	2
B078R196JV	YANGCAN 2004.5-2005 LLY Blocker Kit EGR Block Off Plate DURAMAX Diesel Stainless Steel	EGR Delete Part	2
B07GDSG2TP	Sinister Diesel EGR Kit for 2007.5-2009 Dodge Cummins 6.7L	EGR Delete Part	2
B075RBYDWX	Dual Performance Racing Off Road SS409 Stainless Steel 5" Downpipe Down Pipe Back DPF Exhaust System Kit Compatible With 2011-2017 Ford F250 F350 Superduty Powerstroke 6.7L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	2
B07BNSY8J3	Performance Race Racing Off Road SS409 Stainless Steel 4" Replacement Exhaust Pipe Kit System For 2015.5-2016 Chevy/GMC GM Silverado Sierra 2500 3500 Duramax 6.6L LML Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	3 – including one verified purchase by EPA on December 31, 2019
B07PT3JLSG	BLACKHORSE-RACING 4.0" Downpipe Down Pipe 409 Steel Muffler Pipe Eliminator DPF Exhaust System Kit for 2011-2017 Ford Superduty Powerstroke F250 F350 6.7L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	2 – as of October 29, 2019
B01MTKGD5S	GearboxZ 2007.5-2010 6.0L For Powerstroke +70 HP Competition Programmer GBZ-FED4	Defeat Tuning Product	1
B06W9NTDHS	RaceME ULTRA Programmer w/ Pyro Kit for 07.5-17 Dodge Cummins 6.7L	Defeat Tuning Product	1
B07L6Q8LWY	MM3 Tuner Compatible (Shift on the Fly) with Custom Warp Tunes 2013-2018 Dodge 6.7L Cummins (Unlocks PCM)	Defeat Tuning Product	1 – verified purchase by EPA on January 6, 2020
B07CVKFWVG	GearboxZ for 2011-2016 6.7L Ford Powerstroke Competition Programmer GBZ-E41	Defeat Tuning Product	1 – as of July 22, 2019
B0107RNO6W	Machter EGR Block Off Plate fits Duramax Diesel 2007.5-2011 LMM Blocker Stainless Steel	EGR Delete Part	1
B01F6HWN38	Machter EGR Block Off Plate for DURAMAX Diesel 2004.5-2005 LLY Blocker Stainless Steel Machter	EGR Delete Part	1
B07KYJQCT8	ECCPP EGR Valve Block Off Plate Fit for Powerstroke 6.0L Diesel 2010 Ford E-250 E-350 Super Duty E-450 Super Duty	EGR Delete Part	1
B07N4K8SNP	Machter EGR Block Off Plate for DURAMAX 2006-2007.5, LLY/LBZ Blocker, Stainless Steel	EGR Delete Part	1
B007W45OZ8	aFe 49-03006 ATLAS Aluminized Steel DP-Back Exhaust System for Ford Diesel Trucks V8-6.7L	Exhaust Aftertreatment Delete Pipe	1
B007ZDPZQO	AFE Filters 49-43039 LARGE Bore HD Down-Pipe Back Exhaust System 5 in. Tubing Stainless Steel Incl. Mid-Pipe w/Flange/Muffler/Mid-Pipes/Over Axle Tailpipe LARGE Bore HD Down-Pipe Back Exhaust System	Exhaust Aftertreatment Delete Pipe	1
B075QMH8PH	Performance Racing Off Road Aluminized Steel Dual 4" DownPipe Down Pipe Back DPF Exhaust System For 2008-	Exhaust Aftertreatment Delete Pipe	1

	2010 Ford F250 F350 Super Duty Powerstroke 6.4L Turbo Diesel Pickup Truck		
B0798X1QSM	SS409 Stainless Steel 3.5" Catalytic Converter Exhaust Pipe For 03-07 Ford F250/F350 6.0L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe	1
B07PPQPMV9	BLACKHORSE-RACING Performance Race 4" 409 Steel CAT & DPF Pipe No Bungs Exhaust System Kit for 2008-2010 Ford Powerstroke 6.4L Turbo Diesel	Exhaust Aftertreatment Delete Pipe	1 – as of July 22, 2019
B07XWHBWVG	FLOPRO 18233 7-10 GM LMM RACE PIPE CC/LB NO BUNGS	Exhaust Aftertreatment Delete Pipe	1 – as of April 6, 2020
B000OAW7RA	MBRP S6212AL 4" Turbo Back, Single Side Exit Exhaust System (Aluminized Steel)	Exhaust Aftertreatment Delete Pipe	13 – as of April 10, 2020 and including one verified purchase by EPA on January 29, 2020

In addition to the Defeat Devices identified in Table 1 above that include data on “verified purchases”, the EPA’s review of Amazon’s website also found that Amazon offered for sale, or caused the offer of sale, of 68 additional unique Defeat Devices, including 11 EGR Delete Parts; 50 Exhaust Aftertreatment Delete Pipes; and 12 Defeat Tuning Products for which Amazon did not publish data regarding verified sales as of approximately January 2020.¹⁶ These Defeat Devices are listed in Table 2 below.

Table 2: Other Defeat Devices Offered for Sale on Amazon’s Website

ASIN	Product Name	Defeat Device Category
B07CRBW18K	Cummins ISM CM875 ECI Flash File Delete EGR included Screen File	Defeat Tuning Product
B07CRC8XG4	Cummins ISM CM876 BAB Flash File Delete EGR included Screen File	Defeat Tuning Product
B07CRCRNFH	Cummins ISX CM2250 DPF DEF SCR EGR Delete included videos tutorial	Defeat Tuning Product
B07CRGFJXR	Cummins BAC isx 871 DPF delete included support videos- Calterm Flash File	Defeat Tuning Product
B07DLDPV2P	MM3 Tuner Compatible (Shift On The fly) with Custom Warp Tunes 2010-2012 Dodge 6.7L Cummins	Defeat Tuning Product
B07K9PF2TN	Cummins ISM 875 EGR Delete By Teamviewer on Truck	Defeat Tuning Product
B07K9QMVJL	Cummins ISX 871 Emission Delete By Teamviewer on Truck	Defeat Tuning Product
B07KDFH5P1	Cummins ISM 876 DPF EGR Delete By Teamviewer on Truck	Defeat Tuning Product
B07L6QPNWK	MM3 SOFT Tuner kit for 2013-2018 Dodge 6.7L Cummins	Delete Package (Defeat Tuning Product and Exhaust Aftertreatment Delete Pipe)
B07L6RWDHH	MM3 Tuner kit for 2010-2012 Dodge Cummins	Delete Package (Defeat Tuning Product, EGR Delete Part, Exhaust Aftertreatment Delete Pipe)
B07QPVRN9H	EFI LIVE 2013-2017 RAM 6.7 for Cummins COMPLETE RACE/OFFROAD kit - Single Tune	Delete Package (Defeat Tuning Product, EGR Delete Part, Exhaust Aftertreatment Delete Pipe)
B07QQZNSXD	EFI LIVE 2010-2012 RAM 6.7 for Cummins COMPLETE RACE/OFFROAD kit – CSPF	Delete Package (Defeat Tuning Product, EGR Delete Part, Exhaust Aftertreatment Delete Pipe)
B01LGFH84S	2011- EARLY 15 LML EGR DELETE WITH UP-PIPE	EGR Delete Part
B0794FQWBK	Gorilla Performance R-EGRD-17FORD	EGR Delete Part

¹⁶ Products with “FLOPRO” in the Product Name found as of April 6, 2020.

B0794GC2MS	Gorilla Performance R-EGRD-11-15LML-UPP	EGR Delete Part
B007EHNEZA	Diamond Eye K4372A Down Pipe Back Exhaust Kit	Exhaust Aftertreatment Delete Pipe
B017CX7D0C	aFe Power 49-42047-1B 5" Stainless Large Bore HD Turbo-Back Exhaust System (Non-CARB Compliant)	Exhaust Aftertreatment Delete Pipe
B01MQCDG6N	KIT 5" TURBO-BACK MUFFLER REPLACEMENT PIPE SINGLE; 409 STAINLESS STEEL: 2003-2007 FORD 6.0L POWERSTROKE F250/F350	Exhaust Aftertreatment Delete Pipe
B075NQWH1B	Performance Racing Off Road 4" Downpipe Down Pipe Back DPF Exhaust System Kit 2015.5-2017 Chevy GMC Silverado Sierra 2500HD 3500 Duramax 6.6L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe
B075NT8D3W	Performance Racing Off Road 5" Downpipe Down Pipe Back DPF Exhaust System Kit 2015.5-2017 Chevy GMC Silverado Sierra 2500HD 3500 Duramax 6.6L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe
B075QLQJ8W	Performance Racing Off Road SS409 Stainless Steel Dual 4" DownPipe Down Pipe Back DPF Exhaust System For 2008-2010 Ford F250 F350 Super Duty Powerstroke 6.4L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe
B075QVFJS1	Performance Racing Off Road SS409 Stainless Steel Dual 4" DownPipe Down Pipe Back DPF Exhaust System Kit Compatible With 2011-2019 Ford F250 F350 Superduty Powerstroke 6.7L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe
B075RDLKPV	Performance Racing Off Road SS409 Stainless Steel Dual 4" Turbo Back + Down Pipe Downpipe Included DPF Race Exhaust System 2007.5-2009 Dodge Ram 2500 3500 Cummins 6.7L Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe
B075RDWC9L	Performance Racing Off Road Aluminized Steel Dual 4" Turbo Back + Down Pipe Downpipe Included DPF Race Exhaust System 2007.5-2009 Dodge Ram 2500 3500 Cummins 6.7L Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe
B07BTJWH62	Performance Race Racing SS409 T409 Stainless Steel Off Road 5" Downpipe Down Pipe Back DPF Exhaust System Kit 2015.5-2017 Chevy GMC Silverado Sierra 2500HD 3500 Duramax 6.6L Turbo Diesel Pickup Truck	Exhaust Aftertreatment Delete Pipe
B07PPQK5K5	BLACKHORSE-RACING 4" DPF Pipe Eliminator Back with Clamp Hanger for 2013-2017 Dodge Ram 6.7L Cummins Diesel Truck	Exhaust Aftertreatment Delete Pipe
B07THDLWFP	Diesel Truck Muffler High Flow Exhaust Pipe DPF for Dodge Ram 6.7L Cummins 2013-2017	Exhaust Aftertreatment Delete Pipe
B07Z6L38F6	335D E90/91/92 635D E63 E64 535D E60 E61 X6 E71 35d X5 E70 3.0sd DOWNPIPE DPF DELETE EXHAUST PIPE	Exhaust Aftertreatment Delete Pipe
B07XW8ZL6S	FLOPRO 18213 7-10 GM RACE PIPE CC/SB NO BUNGS	Exhaust Aftertreatment Delete Pipe
B07XLXSS1P	FLOPRO 653NB 11-19 POWERSTROKE 5DOWNPIPE BACK NO MUFFLER NO BUNGS RACE PIPES	Exhaust Aftertreatment Delete Pipe
B07XVPWFZQ	FLOPRO 1674 13-18 DODGE 5 TBE NO BUNGS WITH MUFFLER COIL FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XLWFBYX	FLOPRO 18243 7-10 GM LMM DPF RACE EC/LB NO BUNGS	Exhaust Aftertreatment Delete Pipe
B07XWCY2TN	FLOPRO 18253 7-10 GM LMM RACE PIPE RC/LB NO BUNGS	Exhaust Aftertreatment Delete Pipe
B07XWHC78B	FLOPRO 833NB 8-10 POWERSTROKE6.4 4 DOWNPIPE BACK NO MUFFLER NO BUNGS RACE	Exhaust Aftertreatment Delete Pipe
B07XLXXLCV	FLOPRO 57123 7-10 DODGE CAB & CHASSIS 2ND RACE PIPE NO BUNGS	Exhaust Aftertreatment Delete Pipe
B07XWBK45K	FLOPRO 57113NB 7-12 DODGE 2ND PIPE RACE PIPE NO BUNGS	Exhaust Aftertreatment Delete Pipe
B07XW5QW8V	FLOPRO 57111 7-12 DODGE TRBO DOWNPIPE RACE NO BUNGS	Exhaust Aftertreatment Delete Pipe
B07XW3ZGZL	FLOPRO 18223 7-10 GM LMM RACE PIPE EC/SB NO BUNGS	Exhaust Aftertreatment Delete Pipe
B07XWB426C	FLOPRO 1648 10-12 DODGE 6.7 TBE 5 NO BUNGS RACE	Exhaust Aftertreatment Delete Pipe
B07XLWCTGC	FLOPRO 1649 10-12 DODGE 6.7 TBE 5 NO BUNGS NO MUFFLER RACE	Exhaust Aftertreatment Delete Pipe
B07XVPRVHG	FLOPRO 853NB 11-19 POWERSTROKE6.7L 4 DOWNPIPE BACK NO MUFFLER NO BUNGS RACE FLO PRO	Exhaust Aftertreatment Delete Pipe

B07XWJH1SV	FLOPRO 632NB 8-10 POWERSTROKE 6.4L 5 DOWNPIPE BACK NO BUNGS RACE	Exhaust Aftertreatment Delete Pipe
B07XW82T8P	FLOPRO 838NB 8-10 POWERSTROKE 6.4L 4 TBE NO MUFFLER NO BUNGS RACE	Exhaust Aftertreatment Delete Pipe
B07XW5YLBM	FLOPRO 643NB 8-10 POWERSTROKE 6.4 5TBE NO BUNGS RACE PIPES	Exhaust Aftertreatment Delete Pipe
B07XVQWP4V	FLOPRO 739NB 7-09 DODGE 6.7 4TBE DTP NO MUFFLER/NO BUNGS RACE FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XVQSGPD	FLOPRO 1839 7-09 DODGE 6.7 TBE 4 NO BUNGS NO MUFFLER RACE FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XVQGZGM	FLOPRO 835NB 7-12 DODGE 6.7 4 T2M NO BUNGS RACE FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XVQFN7G	FLOPRO 27123 7-10 DODGE CAB & CHASSIS RACE PIPE NO BUNGS FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XVNR4QZ	FLOPRO 835FNB 7-10 DODGE 4 T2M FLGND NO BUNGS RACE FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XLXH55G	FLOPRO 1639 7-09 DODGE 6.7 TBE 5 NO BUNGS NO MUFFLER RACE	Exhaust Aftertreatment Delete Pipe
B07XLX7LNG	FLOPRO 633NB 8-10 POWERSTROKE 5 DOWNPIPE BACK NO MUFFLER NO BUNGS RACE	Exhaust Aftertreatment Delete Pipe
B07XLTZ5SX	FLOPRO 27111 7-11 DODGE DOWNPIPE NO BUNGS RACE PIPE FLO PRO	Exhaust Aftertreatment Delete Pipe
B07W3TX24G	FLOPRO 832NB 8-10 POWERSTROKE 6.4L 4 DOWNPIPE BACK NO BUNGS RACE	Exhaust Aftertreatment Delete Pipe
B07XW6L8G7	FLOPRO 654 11-17 DODGE CAB & CHASSIS 5 TBE NO BUNGS NO MUFFLER RACE	Exhaust Aftertreatment Delete Pipe
B07XVQFTVK	FLOPRO 27113NB 7.5-12 DODGE DPF ONLY RACE PIPE NO BUNGS FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XWKS2KH	FLOPRO 837NB 8-10 POWERSTROKE 4 DP2M NO BUNGS RACE PIPES	Exhaust Aftertreatment Delete Pipe
B07XVQSNWB	FLOPRO 1673 13-18 DODGE 6.7 5 TBE NO BUNGS NO MUFFLER FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XVP585J	FLOPRO 1849 10-12 DODGE 6.7 TBE 4 NO BUNGS NO MUFFLER RACE FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XVQK6QW	FLOPRO 1848 10-12 DODGE 6.7 TBE 4 NO BUNGS RACE FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XVP3RY3	FLOPRO 857NB 11-19 POWERSTROKE 6.7 4 DP2M NO BUNGS RACE FLO PRO	Exhaust Aftertreatment Delete Pipe
B07XVN3CDL	FLOPRO 1836 7-09 DODGE 6.7 TBE 4 NO BUNGS RACE FLO PRO	Exhaust Aftertreatment Delete Pipe

The Defeat Devices identified in Tables 1 and 2 each have a principal effect to bypass, defeat, or render inoperative devices or elements of design installed on or in a motor vehicle or motor vehicle engine in compliance with Title II of the CAA.

Amazon knew or should have known that these products were offered for sale or sold, to bypass, defeat, or render inoperative elements of design that control emissions of regulated air pollutants from motor vehicles or motor vehicle engines. In December 2017, representatives from EPA's Air Enforcement Division (AED) of the Office of Enforcement and Compliance Assurance (OECA) first engaged with Amazon's regulatory compliance group in a telephone conference concerning the sales of aftermarket defeat devices on its Amazon Marketplace website and requested Amazon remove from its website products and kits that delete emission controls on motor vehicles. In May 2018, AED representatives again engaged via telephone conference with Amazon's regulatory compliance group to discuss removal of defeat device product listings that continued to be posted on its website. Amazon's representatives

indicated it had published a policy on its restricted products webpage indicating that, among the automotive products Amazon prohibits to be sold on its website are:

- *Products intended to defeat, bypass, or shut down emission control devices, including oxygen simulators and CAT, DPF, or EGR delete kits*
- *Products intended to override malfunction indicator lights*¹⁷

Amazon also indicated to AED that it was actively employing a “restricted products classifier” that consists of an automated keyword search that scans the Amazon Marketplace website product listings to identify and remove defeat device listings from the website.

Notwithstanding the above assertions, the EPA has found that Defeat Devices on Amazon’s website are easily located and identified through Amazon’s website search engine using common search terms for Defeat Devices such as: “Delete tuner,” “DPF Delete,” “EGR Delete,” “EGR Block Off,” “DPF Race Exhaust,” “Downpipe back exhaust,” and “Turbo back exhaust.”

Moreover, Amazon’s advertising for many of the Defeat Devices offered for sale on its website prominently state in the product name, description, posted customer questions and answers, and/or posted customer product reviews that such products facilitate the removal, bypass, or “deletion” of a diesel truck’s emission control devices or elements of design. Several examples of these statements published on Amazon’s website include the following excerpts:

- Example 1: The Defeat Tuning Product, “RaceMe ULTRA DPF Delete Programmer 0 7.5-16 Dodge Cummins 6.7L(ASIN B018WDRU9U)¹⁸:

From Customer Questions & Answers:

Question: Can you run this tuner with the dpf and egr still in place?

Answer: EGR yes... DPF no. The DPF will clog and destroy itself and likely your engine, if left in place.

...

Question: I have a 2014 ram 3500, will this system delete all current codes in my ecm, will it delete the def, dpf and egr? do I need to purchase anything else?

Answer: Yes it will

¹⁷ See

https://sellercentral.amazon.com/gp/help/external/help.html?itemID=200164410&language=en_US&ref=efph_200164410_cont_200164330 (last visited Nov. 26, 2019). The webpage further lists the EPA Aftermarket Converter Policy and Clean Air Act as references.

¹⁸ See Example 1 of the Appendix to see screen-captured excerpts of the Amazon webpages associated with this product.

- Example 2: The Delete Package, “MM3 Tuner kit for 2013-2018 Dodge Cummins” (ASIN B07L6RQTS8)¹⁹:

From Customer Questions & Answers:

Question: Can I leave the factory scr on? i do not want to straight pipe it.

Answer: If you do the full delete it will have to be removed

...

Question: The pic shows dpf and egr delete kits. Are they included or extra?

Answer: as shown in pic

- Example 3: The Aftertreatment Delete Pipe, “Stainless Steel 4" DownPipe Down Pipe Back Performance Race Exhaust System Kit For 2008-2010 Ford F250 F350 Power Stroke 6.4L Turbo Diesel Pickup Truck” (ASIN B073X8GCB9)²⁰:

From Customer Questions & Answers:

Question: Does this delete the dpf and cat?

Answer: This downpipe back kit does remove the DPF and catalytic converter.

- Example 4: The Defeat Tuning Product, “Gorilla R110DGP EFI Live Autocal tuner (INCLUDES 1 CUSTOM TUNE)”(ASIN B01MRKYYXV)²¹:

From Customer Reviews:

....

MY LBZ WITH MODS NOW MEETS ITS BEST FRIEND. THESE TUNES NOT ONLY CLEARED MY EGR DELETE, INTAKE GRID HEATER DELETE, AND MANY OTHER MODS THAT REQUIRE TUNING... IT HAS LITERALLY MADE THE MODS I INSTALLED ON THE TRUCK FAR MORE BENEFICIAL FOR THE TRUCK. IT RUNS SMOOTHER AND FAR CLEANER THAN EVER. EASILY 4 TO 5 TIMES THE POWER AND TORQUE THAN STOCK....

...

WOW!! This is the tuner to beat all tuners A+++++++

I was very skeptical shopping tuners but after but after reading reviews took a chance on Gorilla and so glad I did, I needed EGR and grid heater removed, no problem!!... No more CEL and the

¹⁹ See Example 2 of the Appendix to see screen-captured excerpts of the Amazon webpages associated with this package.

²⁰ See Example 3 of the Appendix to see screen-captured excerpts of the Amazon webpages associated with this product.

²¹ See Example 4 of the Appendix to see screen-captured excerpts of the Amazon webpages associated with this product.

power?? Unbelievable... my only gripe may be to somehow get them to partially reimburse me on all the tickets Ill prob get w this thing now!! thanks gdp

- Example 5: aFe 49-03004NM ATLAS Aluminized Steel DP-Back Exhaust System for Ford Diesel Trucks V8-6.4L (AISN B007W45M60)²²:

From Customer Reviews:

Completely woke my truck up after replacing the OEM exhaust ...

Completely woke my truck up after replacing the OEM exhaust with this aFe system. A programmer is required as this deletes both the DPF and CAT. If loud is what you're looking for this is it, roll the windows down hear the twins roar as the only restriction is the downpipe. Removing the old system tougher than the installation too maybe 30 minutes after I got the old system out. Unless your're going to save the old system, just take a saw to it and save yourself hours of hassel (sic).

- Example 6: EGR Delete Part, "Sinister Diesel EGR Cooler Kit for Dodge Cummins 2010-2016 6.7L" (AISN B076MD6298)²³:

From Customer Reviews:

The 135k EGR valve/cooler cleaning was coming due on my 2010 Ram 2500/6.7 and since this "ingenious" device is such an engine killer I decided to delete. I chose the Sinister kit based on good reviews and I could not be happier.... My tuner is an MM3 Lite that I got from Double R Diesel and the combination works flawlessly. ... I'm happy with my decision to delete. My truck has never run better. Probably because it's getting the cool/clean air a diesel engine needs and not the hot/sooty abrasive air the EGR was shoving into the intake. Hope this helps.

In sum, the EPA finds Amazon continues to sell, offer to sell, or causes the sale or offer of sale of easily-identifiable Defeat Devices despite its asserted efforts to prevent sales of Defeat Devices on its website.

Enforcement

Note that EPA did not conduct an exhaustive search to identify and catalogue every Defeat Device offered for sale on Amazon's website during the review timeframe of July 2019 to April 2020. Our investigation of Amazon's compliance with the CAA continues. The actual number of Defeat Devices sold or caused to be sold by Amazon is likely much higher for the listed products than what is identified in the Tables above. The EPA expects the company to take prompt measures to cease violations and come into compliance with the CAA.

The EPA may bring an enforcement action for these violations, and other violations it identifies, under its administrative authority or by referring this matter to the United States Department of Justice with a

²² See Example 5 of the Appendix to see screen-captured excerpts of the Amazon webpages associated with this product.

²³ See Example 6 of the Appendix to see screen-captured excerpts of the Amazon webpages associated with this product.

recommendation that a civil complaint be filed in federal district court.²⁴ Persons violating Section 203(a)(3)(B) of the Act, 42 U.S.C. §§ 7522(a)(3)(B), are subject to an injunction under Section 204 of the Act, 42 U.S.C. § 7523, and a civil penalty of up to \$4,819 for each violation.²⁵

The EPA is available to discuss this matter with you in further detail upon your request. Please contact Mark Palermo, an EPA attorney assigned to this matter, within 14 days of receipt of this Notice of Violation. Mr. Palermo can be reached at (202) 564-8894 or palermo.mark@epa.gov.

The EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in scheduling a conference with you to discuss this Notice of Violation, while still ensuring that the Agency can resolve the violations identified in this Notice of Violation and confirm your company's future compliance with the CAA.

Sincerely,

For: Phillip A. Brooks
Director
Air Enforcement Division
Office of Civil Enforcement

²⁴ CAA §§ 204, 205, 42 U.S.C. §§ 7523, 7524.

²⁵ CAA § 205(a), 42 U.S.C. § 7524(a); 40 C.F.R. § 19.4.

Example 1 – “RaceMe ULTRA DPF Delete Programmer 07.5-16 Dodge” (ASIN B018WDRU9U)

15



RaceME ULTRA DPF Delete Programmer 07.5-16 Dodge Cummins 6.7L

by Raceme

Customer Questions & Answers

Find answers in product info, Q&As, reviews

Q Type your question or keyword

Showing 31-40 of 56 questions

Sort by Most Helpful first

▲
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votes
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Question: Do you add custom tunes
Answer: Hello - the tunes are already built in. Thanks!
MoreDieselHP Seller · October 13, 2019

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votes
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Question: Amazon doesn't give me a overnight shipping option how can I get it overnighted to me and it doesn't offer sat. Delivery either
Answer: We do offer overnight shipping.
Thanks,
Monster Performance... [see more](#)
Monster Performance Exhaust Seller · April 14, 2017

▲
0
votes
▼

Question: Can you update this tuner with MacBook Pro ?
Answer: Yes
Lance Buchanan · August 13, 2019

▲
0
votes
▼

Question: Will this on my 2014 ram 6.7 3500
Answer: Yes
Rax · October 28, 2019
[See all 3 answers](#)

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votes
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Question: Can you run this tuner with the dpf and egr still in place?
Answer: EGR yes.... DPF no. The DPF will clog and destroy itself and likely your engine, if left in place.
MR JASON R DEWITT · September 16, 2016
[See all 2 answers](#)

▲
0
votes
▼

Question: Can this adjust your speedometer for larger tire sizes?
Answer: Yes you can.
Zack · May 24, 2017
[See all 4 answers](#)

▲
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votes
▼

Question: Does it come with the tunes in it like lope and all that ?
Answer: This tuner comes loaded and ready to go.
Thanks,
Monster Performance... [see more](#)
Monster Performance Exhaust Seller · December 14, 2016
[See all 5 answers](#)

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votes
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Question: Do you have the egr and def delete kit to for the 2016 mega cab.
Answer: Need more info. give us a call.
Thanks,
Monster Performance... [see more](#)
Monster Performance Exhaust Seller · July 12, 2016
[See all 2 answers](#)

▲
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votes
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Question: I have a 2014 ram 3500, will this system delete all current codes in my ecm, will it delete the def, dpf and egr? do i need to purchase anything else
Answer: Yes it will
Advance Diesel & Motorsports Seller · August 3, 2019
[See all 3 answers](#)

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votes
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Question: How much hp and torque is this rated for on a 2013 cummind
Customers are chatting about this [View conversation](#)
Answer: Tune engine with HP increases of up to 200HP in 10 stages.
https://www.amazon.com/s/ref=nb_sb_noss?url=me%3DA3KEMC7HPEBMWZ&field-keywords=raceme+ultra
Thanks, ... [see more](#)
Monster Performance Exhaust Seller · September 24, 2017
[See all 2 answers](#)

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Share    

Have one to sell? [Sell on Amazon](#)

Customer questions & answers

🔍 Have a question? Search for answers

▲
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votes
▼

Question: [Does it come with egt probe or do I have to buy separate](#)

Answer: no... will need to buy that separate
By Diesel Performance [SELLER](#) on August 26, 2019

▼ [See more answers \(1\)](#)

▲
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votes
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Question: [Can i leave the factory scr on? i do not want to straight pipe it.](#)

Answer: If you do the full delete it will have to be removed
By Stacey B. on August 26, 2019

▲
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votes
▼

Question: [The pic shows dpf and egr delete kits. Are they included or extra?](#)

Answer: as shown in pic
By Diesel Performance [SELLER](#) on October 23, 2019

▲
0
votes
▼

Question: [Can I change tpms settings with this tuner?](#)

Answer: Yes
By Diesel Performance [SELLER](#) on August 29, 2019

[See more answered questions \(22\)](#)

Example 3 - Stainless Steel 4" DownPipe Down Pipe Back Performance Race Exhaust System Kit For 07.5-10 Chevy/GM 2500/3500 Duramax Turbo Diesel Pickup Truck (ASIN B073X8GCB9)



Roll over image to zoom in

Stainless Steel 4" DownPipe Down Pipe Back Performance Race Exhaust System Kit For 2008-2010 Ford F250 F350 Power Stroke 6.4L Turbo Diesel Pickup Truck

by MVP Auto Parts
★★★★★ 1 customer review | 5 answered questions

Price: **\$280.09 & FREE Shipping**

Get \$10 off instantly: Pay \$270.09 upon approval for the Amazon Prime Store Card.

- Fit: 2008 to 2010 Ford F250 & F350 6.4L Turbo Diesel Pickup Truck
 - 4" Down Pipe Back Performance Exhaust System
 - Will Fit Extended & Crew Cab, Short Bed or Long Bed. Extension Pipe May Require Trim-To-Length, Depending On Wheelbase
 - Straight Pipe Design, No Muffler or Tip. Mandrel Bent Tubing For Maximum Flow
 - SS409 Stainless Steel. Top Quality & Affordable Products. Professional Installation Recommended
- See more product details

New (1) from \$280.09 & FREE shipping.



Your medication, delivered



Learn more >

Save on AmazonBasics and SupplyMaster Safety Gear



SupplyMaster
Disposable
Exam Nitrile
Gloves, 400
pk
EUR 22.50



AmazonBasics
Blue Light
Blocking
Safety
Glasses, 12pk
\$31.27



AmazonBasics
Noise
Reduction
Safety
Earmuffs
\$11.96

\$280.09
+ **FREE Shipping**

Get it as soon as July 24 - 26
when you choose **Expedited Shipping** at checkout.

Only 5 left in stock - order soon.

Qty: 1

\$280.09 + Free Shipping

Add to Cart

Buy Now

Ships from and sold by MVP Auto Parts.

Add a Protection Plan:

- ☐ 3-Year Protection for \$51.29
- ☐ 2-Year Protection for \$3.69

Deliver to Arlington 22201

Add to List

Share

Have one to sell?

Sell on Amazon

Customer questions & answers

Have a question? Search for answers

▲
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votes
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Question: If I have a crew cab longbed and my truck is fully deleted with a straight pipe from the down pipe all the way to the tip will this be a good repla

Answer: This is a direct fit downpipe back system, fits long beds using all extension pipes provided.
By MVP Auto Parts **SELLER** on October 6, 2017

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votes
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Question: Does this delete the dpf and cat

Answer: This downpipe back kit does remove the DPF and catalytic converter.
By MVP Auto Parts **SELLER** on April 10, 2017

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votes
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Question: Will this fit a single can long bed?

Answer: Yeah it comes in several pieces that clamp together to allow you to get the perfect fit for your truck.
By MALONE on May 15, 2018
See more answers (1)

▲
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votes
▼

Question: Does this have bungs

Answer: This has no bungs.
By MVP Auto Parts **SELLER** on April 10, 2017

See more answered questions (1)

Example 4 - Gorilla R11DGP EFI Live Autocal Tuner (INCLUDES 1 CUSTOM TUNE) (ASIN B01MRKYYXV)

Gorilla R110DGP EFI Live Autocal Tuner (INCLUDES 1 CUSTOM TUNE)

by GORILLA

★★★★☆ 6 ratings | 21 answered questions

Price: **\$599.99** & **FREE Shipping**

Get \$50 off instantly: Pay ~~\$599.99~~ \$549.99 upon approval for the Amazon Rewards Visa Card. No annual fee.

- GORILLA PERFORMANCE R110DGP 01-10 DURAMAX EFI LIVE BLANK AUTOCAL (INCLUDES 1 CUSTOM TUNE)
- [See more product details](#)

\$599.99

& **FREE Shipping**

Get it as soon as **Oct. 31 - Nov. 1** when you choose **Expedited Shipping** at checkout.

Only 2 left in stock - order soon.

...

6 customer reviews

Top Reviews ▾



USMC Dis Vet

★★★★★ MY LBZ WITH MODS NOW MEETS ITS BEST FRIEND. THESE TUNES NOT ONLY CLEARED MY EGR

...

June 2, 2018

Verified Purchase



MY LBZ WITH MODS NOW MEETS ITS BEST FRIEND. THESE TUNES NOT ONLY CLEARED MY EGR DELETE, INTAKE GRID HEATER DELETE, AND MANY OTHER MODS THAT ARE REQUIRE TUNING.... IT HAS LITERALLY MADE THE MODS I INSTALLED ON THE TRUCK FAR MORE BENEFICIAL FOR THE TRUCK. IT RUNS SMOOTHER AND FAR CLEANER THAN EVER. EASILY 4 TO 5 TIMES THE POWER AND TORQUE THAN STOCK. I HAVE ONLY USED EFI LIVE WITH RDP TUNING AND VERY PLEASED. FEEL FREE TO ASK QUESTIONS OR CONCERNS



6 people found this helpful

Helpful

Comment

Report abuse



Marc H.

★★★★★ **Amazing customer service to back product!!**

June 25, 2019

Verified Purchase

I purchased this GDP EFI LIVE tuner due to all the positive customer service comments on forums. I was not let down. I made a small mistake on my form not checking DSP5 for my switch and they fixed my software at no charge. I waited less than 30 min for a new updated tune to be emailed out. This is the best customer service I have ever received period. The tunes are great to add as well... Purchase this thing ...

One person found this helpful

Helpful

| Comment

| Report abuse



wcba C.E.O.

★★★★★ **WOW!! this is the tuner to beat all tuners A+++++++**

January 26, 2019

Verified Purchase

I was very skeptical shopping tuners but after reading reviews took a chance on Gorilla and so glad I did, I needed EGR and grid heater removed, no problem!! after filling out the spec sheet questions on my truck they had created and emailed my tune in a matter of 3 days. very helpful tech line , No more CEL and the power?? unbelievable..... my only gripe may be to somehow get them to partially reimburse me on all the tickets Ill prob get w this thing now!!! thanks gdp

One person found this helpful

Helpful

| Comment

| Report abuse



Felicia

★★★★★ **2003 LB7 DURAMAX**

March 11, 2019

Verified Purchase

A must have. Great instructions, great support, got my custom tune online and uploaded using their software. 10/10 Great tuner. First time tuning, but mechanically and computer inclined. Got the truck flashed in an hour

One person found this helpful

Helpful

| Comment

| Report abuse



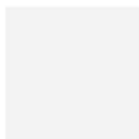
Amazon Customer

★★★★★ **GDP is 5 Stars**

December 14, 2018

Verified Purchase

Highly recommend This product GDP & with awesome staff that fixed and woke up my truck after 140,000 miles and got rid of all my problems!! Time to pull them sleds all around let it snow!!OR,WA,CA,MT,ID,WY :)



One person found this helpful

Helpful

| Comment

| Report abuse



Chad walker

★☆☆☆☆ **Disappointed**

May 11, 2019

Verified Purchase

Didn't get a good one got a used one

Helpful

| Comment

| Report abuse

Example 5 – aFe 49-03004NM ATLAS Aluminized Steel DP-Back Exhaust System for Ford Diesel Trucks V8-6.4L (AISN B007W45M60)

aFe 49-03004NM ATLAS Aluminized Steel DP-Back Exhaust System for Ford Diesel Trucks V8-6.4L

by aFe Power

★★★★★ 5 ratings

Customer reviews

★★★★★ 4.8 out of 5

5 customer ratings

5 star	<div></div>	76%
4 star	<div></div>	24%
3 star	<div></div>	0%
2 star	<div></div>	0%
1 star	<div></div>	0%

5 customer reviews

Top Reviews



Ted Brooks Jr

★★★★★ Completely woke my truck up after replacing the OEM exhaust ...

August 3, 2015

Verified Purchase

Completely woke my truck up after replacing the OEM exhaust with this aFe system. A programmer is required as this deletes both the DPF and CAT. If loud is what you're looking for this is it, roll the windows down hear the twins roar as the only restriction is the downpipe. Removing the old system tougher than the installation took maybe 30 minutes after I got the old system out. Unless you're going to save the old system, just take a saw to it and save yourself hours of hassel.

3 people found this helpful

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Example 6 – Sinister Diesel EGR Cooler Kit for Dodge Cummins 2010-2016 6.7L (ASIN B076MD6298)



Good2Go

★★★★★ 2010 6.7 - No Problems

September 12, 2018

Verified Purchase

The 135K EGR valve/cooler cleaning was coming due on my 2010 Ram 2500 6.7 and since this "ingenious" device is such an engine killer I decided to delete. I chose the Sinister kit based on good reviews and I could not be happier. Installation instructions were very good and videos are available on YT. Everything fit right and I didn't have to do any modifications to work around problems (everything else on my engine was stock). My tuner is an MM3 Lite that I got from Double R Diesel and the combination works flawlessly. I would recommend getting a shibby plug set to cap off now-no-longer-needed wiring harnesses to protect them from the elements. I got this kit from DRD also. I'm happy with my decision to delete. My truck has never run better. Probably because it's getting the cool/clean air a diesel engine needs and not the hot/sooty/abrasive air the EGR was shoving into the intake. Hope this helps.



Sinister Diesel EGR Cooler Kit for Dodge Cummins 2010-2016 6.7L

by Sinister Diesel

★★★★★ 16 customer reviews | 31 answered questions

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